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December 1, 2000

The Honorable Judge J. Frederick Motz
United States District Court
for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201
VIA HAND DELIVERY

Re: *Whiting-Turner Contracting Co. v.*
Mass. Electric Construction Co.
Civil No.: JFM 00 835
and
Mass Electric Construction Co.,
v. Whiting-Turner Contracting Co.
Civil No.: JFM 00 1885
Our File No. 00-0171

Dear Honorable Judge Motz:

This firm represents of Mass Electric Construction Company in the captioned case. Mass Electric and Whiting-Turner Contracting Company respectfully request your approval of their agreement to extend the time for Mass Electric to respond to Whiting-Turner's Motion for Partial Summary Judgment from December 1, 2000 to January 15, 2001. In addition, the parties request that the mediation conference with Judge Grimm currently scheduled for January 8, 2001 be re-scheduled to a later date. If you approve, we will call Judge Grimm's chambers next week to coordinate a new date.

The parties have exchanged Requests for Production of Documents and Responses, and are beginning to review each others documents so as to address the contract, and allegations of delays, inefficiencies, and impact claims between them. Mass Electric is beginning to review Whiting-Turner's documents on December 1, 2000. Due to the volume of documents in possession of both parties, it is expected that the document review process for each side will take several days. Mass Electric's project documents are maintained near their offices in Brighton, Massachusetts. Under the circumstances we believe the requested extensions are reasonable and necessary and will not prejudice either party.

If the Court approves this extension, the existing schedule will change as follows

	<u>Current Schedule</u>	<u>Revised Schedule</u>
Deadline for Mass Electric to file Motion for Partial Summary Judgment regarding settlement of delay claim	December 1, 2000	January 15, 2001
Deadline for Whiting-Turner to file Reply in Support of Motion for Partial Summary Judgment	December 22, 2000	February 15, 2001

14

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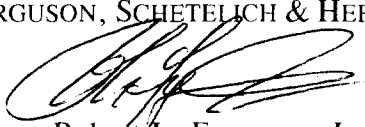
The Honorable Judge J. Frederick Motz
December 1, 2000
Page 2

Deadline for Whiting-Turner to make Rule 26(a)(2) disclosures, except opinions	January 5, 2001	February 19, 2001
Mediation Conference	January 8, 2001	to be rescheduled
Deadline for Mass Electric to make Rule 26(a)(2) disclosures, except opinions	March 2, 2001	April 20, 2001
Status Conference (may be by telephone)	March 15, 2001	March 15, 2001
Deadline for Whiting-Turner to make disclosure of expert opinions	April 6, 2001	May 21, 2001
Deadline for Mass Electric to make disclosures of expert opinions	May 18, 2001	June 29, 2001
Deadline for Whiting-Turner to make disclosure of rebuttal expert opinions	June 8, 2001	July 20, 2001
Discovery deadline	July 27, 2001	September 6, 2001

Mr. Huddles, counsel for Whiting-Turner, has reviewed the contents of this letter and I have his authorization to state that he is in agreement with all of the above.


Respectfully submitted,

FERGUSON, SCHETELICH & HEFFERNAN, P. A.

By: 
Robert L. Ferguson, Jr.
RLF\dms

cc: William M. Huddles, Esquire(via facsimile)
Kieran Meagher, Esquire

APPROVED AND SO ORDERED


Chief Judge
United States District Court

December 4, 2000
Date

Please contact the magistrate judge to reschedule the mediation conference
